

EXHIBIT C

COMMONWEALTH OF MASSACHUSETTS

Essex, SS.

Eugene Pelikhov,

Plaintiff,

v.

Gold and Farb, Inc.,
Lev Goldfarb,
Alexander Goldfarb, and
Lydmila Rogalin

Defendants.

**Trial Court Division
Essex Superior Court
Civil Action No.:
1577CV01902A**

DECLARATION OF EUGENE PELIKHOV
IN SUPPORT OF
APPLICATION FOR INSPECTION OF CORPORATE RECORDS

I, Eugene Pelikhov, being duly sworn, do declare and state as follows:

1. I am the Plaintiff in the above captioned action and over the age of 18. This declaration is based on my personal knowledge and the statements herein are true and correct to the best of my knowledge. If called as a witness, I could and would testify as to the facts set forth in this declaration.

2. On or about January 18, 2008, I purchase 25% of the shares of Defendant Gold and Farb, Inc. ("GFI") for \$175,000 from Defendant Lydmila Rogalin.

3. I was a shareholder, officer and director of GFI.

4. The other shareholders, directors and officers of GFI were Lev Goldfarb and Alexander Goldfarb, Ms. Rogalin's husband and son, respectively.

5. I was entitled to full access to the corporate and accounting records of GFI.

6. In the ensuing years, I began to suspect that the Goldfarbs were engaging in embezzlement from GFI and withholding profits from me.

7. I made many requests over time for access to the records, but the Goldfarbs rejected me.

8. On or about July 17, 2014, I, by and through my legal counsel, made demand upon the Defendants pursuant to Massachusetts General Laws, Chapter 156D, Section 16.02 for, among other things, access to GFI's corporate records.

9. To this day, the Defendants have not given me access to the records of the corporation.

Signed under the pains and penalties of perjury this 8th day of June, 2016.



Eugene Pelikhov